

UNITED STATES BANKRUPTCY COURT
FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In the Matter of:

DENNIS WAYNE MORGAN
AND
LISA DAWN MORGAN

Debtors

Chapter 13

Case No. 15-13395-BFK

OBJECTION TO CLAIM
NOTICE OF OBJECTION TO CLAIM
AND
NOTICE OF SCHEDULED HEARING ON THIS OBJECTION

To:
U.S. Bank Trust National Association, as
Trustee of the SCIS Series III Trust
BSI Financial Services
1425 Greenway Drive, Ste. 400
Irving, TX 75038

Dennis Wayne Morgan
Lisa Dawn Morgan
12849 Elk Run Road
Midland, VA 22728

Incorp Services, Inc.
Registered Agent for
BSI Financial Services
7288 Hanover Green Dr.
Mechanicsville, VA 23111

John C. Morgan, Jr., Esquire
Attorney for Debtor
New Day Legal, PLLC
98 Alexandria Pike, Ste. 10
Warrenton, VA 20186

Andrew Cecere, Chairman/Pres./CEO
U.S. Bank Trust National Association
300 East Delaware Ave., 8th Floor
Wilmington, DE 19809

Office of the Secretary
of the Commonwealth
1111 East Broad Street, 4th Floor
Richmond, VA 23219

You have filed a claim in the amount of \$413,450.68 (arrearage of \$38,014.15) with a Court claim number of 7 in this Chapter 13 case.

Thomas P. Gorman, Chapter 13 Trustee, has filed this objection to your filed claim and asks that the remaining balance be disallowed the Plan confirmed in this case on February 6, 2019 provides for the property to be surrendered, relief from the automatic stay has been granted by an Order entered August 31, 2018 and no claim for the unsecured or deficiency balance has been filed.

Objection to Claim, page 2
15-13395-BFK, Dennis Wayne and Lisa Dawn Morgan

Your claim may be reduced, modified or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before five business days prior to the hearing date, you or your attorney must:

File with the court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before five business days prior to the scheduled hearing. You must mail a copy to the persons listed below.

Attend the hearing to be held on July 25, 2019 at 1:30 p.m. in Courtroom #1 on the 2nd floor, United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

Thomas P. Gorman
300 North Washington Street, Ste. 400
Alexandria, VA 22314

Clerk of the Court
United States Bankruptcy Court
200 South Washington Street
Alexandria, VA 22314

If you or your attorney do not take these steps, the court will decide that you do not oppose objection to your claim.

Date: June 5, 2019

/s/ Thomas P. Gorman
Thomas P. Gorman
Chapter 13 Trustee
300 N. Washington St.; Ste. 400
Alexandria, VA 22314
(703) 836-2226
VSB 26421

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of June, 2019, served via ECF to authorized users or mailed a true copy of the foregoing Objection to Claim, Notice of Objection, and Notice of Hearing to the parties listed in the heading hereof.

/s/ Thomas P. Gorman
Thomas P. Gorman